

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking Regarding
Emergency Disaster Relief Program.

Rulemaking 18-03-011
(Filed March 22, 2018)

**JOINT WORKSHOP STATEMENT OF SAN DIEGO GAS & ELECTRIC COMPANY (U
902 M) AND SOUTHERN CALIFORNIA GAS COMPANY (U 904 G) ON ASSIGNED
COMMISSIONER AND ADMINISTRATIVE LAW JUDGE RULING**

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Pursuant to the “Assigned Commissioner and Administrative Law Judge’s Ruling Noticing Workshops and Ordering Workshop Statements” issued on October 1, 2018 (“Ruling”), San Diego Gas & Electric Company (“SDG&E”) and Southern California Gas Company (“SoCalGas”) provide workshop statements on the topics contained in Section 3.4 of the Ruling.¹

I. SECTION 3.4 ELECTRIC AND NATURAL GAS SERVICE

Actions Taken When Disaster Strikes

1. Trigger of Emergency Disaster Relief Program
 - a. Upon the issuance of the Governor’s state of emergency proclamation, electric and natural gas utilities shall file a Tier 1 advice letter within 15 days notifying the Commission of compliance to the emergency disaster relief program to R.18-03-011. The Tier 1 advice letter is required where utility service to the customer is disrupted or degraded. Therefore:
 - i. How should the Commission interpret and consequently, define “disruption of the delivery or receipt of utility service?”

¹ In accordance with Rule 1.8(d), counsel for SoCalGas has been authorized by SDG&E to file this Joint Workshop Statement on its behalf.

The “disruption of the delivery or receipt of utility service” was addressed in D.18-08-004 (issued August 20, 2018) and clarified that “loss or disruption of the delivery or receipt of utility service” means when a disaster has resulted in the destruction or damage of a structure, such that utility service is disrupted voluntarily or involuntarily due to safety concerns or re-construction activities to address the damage from a proclaimed state of emergency event. D.18-08-004, page 5, footnote 4 (emphasis added).

Disruption of the delivery or receipt of utility service may need to be defined differently for natural gas and electric service. SDG&E and SoCalGas look forward to discussing these definitions with all interested parties at the workshop. Until then, SDG&E and SoCalGas note that in the context of emergencies and disasters, there is at least one substantive difference between electric distribution and gas distribution. Whereas a gas outage requires trained personnel to be physically present at the household to re-instate service through a turn-on process that must be scheduled and completed to make sure it is performed safely, electric outages are typically handled in a less labor-intensive manner (e.g., a physical presence is not always needed in a residential household to reinitiate electric service). Accordingly, electric service restoration following some emergency situations could occur more quickly than a similarly widespread gas shortage or delivery interruption.

- ii. How should the Commission interpret and consequently, define “degradation of the quality of utility service?”

See generally response 1(i) above. SDG&E and SoCalGas believe the definition of degradation of the quality of utility service should be discussed at the workshop with all interested parties. Degradation of the quality of utility service after a disaster would likely differ between electric service and gas service. For instance, as explained above, during disasters that impact natural gas service, gas service is either available or not available to the household.

- iii. Are there other emergency declarations (e.g., federal or local government proclamations) that affect utility service

that the Commission should recognize?

Utility customers could be affected by federal or local proclamations. Given the wide range of potential declarations or proclamations, if and how the Commission would recognize such declarations should be discussed further in workshops.

Actions During the Disaster

2. Emergency Disaster Relief Customer Protections and Coverage

- a. How should the Commission structure an emergency disaster relief customer protection program so that it is most beneficial to customers and in which the specific case or circumstance require?

A customer protection program that is most beneficial should reflect a short-term and long-term consideration of the customers' needs. The protections must assist impacted residents in assuring adequate shelter and medical treatment in the short-term. In the long-term, the protections should seek to minimize the impact of the disaster on customers' ability to regain their quality of life. Thus, it is important to balance the customers' ability to defer bills from utilities with the long-term financial burden that may arise from delaying those utility bills.

- b. Are the protections in Resolutions M-4833 and M-4835 sufficiently inclusive? Should other measures be added?
 - i. As a default measure, should the Commission adopt all of the post-disaster customer protections promulgated by Resolutions M-4833 and M-4385?

See SoCalGas' remarks in Opening Comments of Southern California Gas Company on Order Instituting Rulemaking Regarding Emergency Disaster Relief Program to Support California Residents, filed May 2, 2018 at page 2.

- c. What type of catastrophic events should the Commission identify that necessitate the emergency disaster relief customer protections?

Emergency disaster relief customer protections should be considered necessary for gas and electric customers when a catastrophic event has directly impacted the ability for the customer to receive electric and or natural gas service.

- i. Should the catastrophes affect the quality or receipt of utility service?

Yes, see above response.

- d. Should the customer protection measures be effective from the date of the Governor's state of emergency? What is an appropriate end date or default provision the Commission should adopt?

See SoCalGas' remarks in Opening Comments of Southern California Gas Company on Order Instituting Rulemaking Regarding Emergency Disaster Relief Program to Support California Residents, filed May 2, 2018 at page 5.

- i. Should customers within a disaster zone(s) have a self-identification requirement or should the utility identify those customers who have a primary residence or small business in the disaster zone as "covered" for the eligibility purposes of the emergency disaster relief program?

Customers should be able to self-identify in order to prevent impacted residents from being excluded. Eligible customers would be any residential and certain non-residential customers who are directly impacted by the disaster and identified as such by SDG&E and SoCalGas, or who have appropriately self-reported as being impacted.

For natural gas services, utilities can roughly identify disaster zones and possible service accounts within those zones. Because of the variability and uncertain nature of disasters, however,

SoCalGas cannot promptly identify which accounts are impacted with a high degree of precision.

- e. Should the Commission consider a residential customer or small commercial customer as “covered” by the emergency disaster relief customer protections if their primary residence or small business is in a disaster zone?
 - i. Should the Commission give consideration to those customers who do not necessarily live or own a small business within the disaster zone but work for a business that was affected by the disaster? If yes, what kind?

See SoCalGas’ remarks in Opening Comments of Southern California Gas Company on Order Instituting Rulemaking Regarding Emergency Disaster Relief Program to Support California Residents, Filed May 2, 2018 at page 3.

- ii. Should the Commission give any consideration to affected customers residing outside of a disaster zone but are nevertheless, indirectly affected by the disaster? Should this include such measures as flexible payment plans?

See SoCalGas’ remarks in Opening Comments of Southern California Gas Company on Order Instituting Rulemaking Regarding Emergency Disaster Relief Program to Support California Residents, filed May 2, 2018 at Page 3.

In addition; “In-directly affected” would need to be defined to deter and identify fraudulent abuse but still allow for some discretion by the IOU’s to allow for inclusion should conditions warrant.

- 3. In addition to the protections and requirements of Resolutions M-4833 and M-4385, what additional components should the Commission consider as part of a

full proposal of an emergency disaster relief customer protection program for utility customers?

See SoCalGas' remarks in Opening Comments of Southern California Gas Company on Order Instituting Rulemaking Regarding Emergency Disaster Relief Program to Support California Residents, filed May 2, 2018 at page 2.

4. Cost Recovery

- a. Currently, the Commission has directed the utilities to track emergency customer protection costs in the Emergency Customer Protections Memorandum Account or Catastrophic Event Memorandum Account.

- i. Should the Commission require the utilities to continue to use these accounts or should another cost tracking mechanism be considered?

SDG&E and SoCalGas do not believe that any additional tracking mechanisms are required at this time. SDG&E and SoCalGas may update the existing tariffs as needed, or request additional tracking mechanisms depending on the addition or modification of customer protections resulting from the proceeding.

5. Lessons Learned

- a. Discuss the challenges customers and utilities have faced during the implementation of Resolutions M-4833 and M-4385 and what modifications the Commission should consider to ease these challenges.

SDG&E and SoCalGas recommends that this topic be addressed at a workshop, or workshops organized by type of service. Workshop would provide more opportunity for targeted questions and in-depth discussion where appropriate.

- b. Discuss what additions or modifications the Commission should consider from the experience learned in implementing Resolutions M-4833 and M-4385.

See response above.

6. Other considerations

- a. Should the utilities file a Tier 2 advice letter with proposals of customer education and outreach to raise awareness of the emergency disaster relief customer protection program and its resources?

The reach, depth, frequency, timing and cost of customer education and outreach efforts should be proposed by the utilities which would then be discussed in a workshop that can provide a forum for questions and input by the parties. After the workshop, the utilities should file proposed customer education and outreach plans. Parties would be able to provide comments and reply comments to the proposals.

- b. How should the utilities coordinate and utilize 211 service?

SDG&E and SoCalGas believes that coordination with the 211 service should be discussed further, but does not have enough information at this time to provide a comment.

Actions Taken When Disaster Ends

7. The electric and natural gas utilities shall file a Tier 1 Advice letter stating:

- a. Whether or not service has been restored;
- b. Discuss problems, challenges, and lessons learned of implementation during the disaster; and
- c. Suggest any modifications to the emergency disaster relief program that could be re-calibrated to achieve optimum performance.

SDG&E and SoCalGas believe that filing a Tier 1 advice letter should be optional in order to provide each utility with the ability to suggest any

modifications to the emergency disaster relief program to achieve optimum performance. Such an advice letter would also include whether or not service has been restored and challenges, or lessons learned during the disaster.

II. CONCLUSION

SDG&E and SoCalGas look forward to working with Commission staff and interested parties in this important rulemaking.

Respectfully Submitted
on behalf of Southern California Gas Company and
San Diego Gas & Electric Company,

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